

Exhibit

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From: Eric Opiela [eopiela@ericopiela.com]
Sent: Friday, November 19, 2010 6:39 AM
To: Gerardo Interiano
Cc: 'Lisa Kaufman'
Subject: Re: useful metric

Happy to. Thanks Gerardo. Think of as "OHRVS" Optimal Hispanic Republican Voting Strength....a measure of how Hispanic, and Republican at the same time we can make a particular census block.

On Nov 19, 2010, at 6:17 AM, Gerardo Interiano wrote:

> I will gladly help with this Eric, but you're going to have to explain
 > to me in layman's terms. Maybe you and I can sit down and go through
 > this and you can show me exactly what you want next week or after Thanksgiving.

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 > -----Original Message-----
 > From: Eric Opiela [mailto:eopiela@ericopiela.com]
 > Sent: Wednesday, November 17, 2010 10:19 PM
 > To: Gerardo Interiano
 > Cc: Lisa Kaufman
 > Subject: useful metric

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 > Just had a thought I needed to get out before I forget it. The raw
 > data to calculate this is going to be in the PL 94-171 dataset we'll
 > get in March (hopefully), but it would be really useful for someone to
 > go in and calculate a ratio for every census block in the state of
 > CVAP/Total Population, a ratio of Hispanic CVAP/Total Hispanic
 > Population, a ratio of Spanish Surname RV/Hispanic CVAP, and a ratio
 > of Spanish Surname RV/Total Hispanic Population (these last two have
 > to be calculated with the voter file overlaid with census data). It
 > also would be good to calculate a Spanish Surname Turnout/Total
 > Turnout ratio for the 2006-2010 General Elections for all VTDs (I
 > already have the data for this for 2006-2008 in a spreadsheet, just
 > need to gather it for every VTD for 2010). These metrics would be
 > useful in identifying a "nudge factor" by which one can analyze which
 > census blocks, when added to a particular district (especially 50+1
 > minority majority districts) help pull the district's Total Hispanic
 > Pop and Hispanic CVAPs up to majority status, but leave the Spanish
 > Surname RV and TO the lowest. This is especially valuable in shoring
 > up Canseco and Farenthold. =

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THE STATE OF TEXAS
 v. UNITED STATES et al.
 Case No. 11-CV-1303

DEFENDANT'S EXHIBIT

DX304